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U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

May 12, 2016

There will be a bail hearing as to Jason Galanis and John Galanis on May 17, 2016 at 3 p.m.
SO ORDERED
USDJ
5-12-16

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan Federal Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: **United States v. Jason Galanis et al.,**
15 Cr. 643 (PKC)

Dear Judge Castel:

The Government writes to advise the Court that three of the defendants charged in the indictment in the above-captioned matter (the "Indictment") – Jason Galanis, John Galanis and Gary Hirst – were arrested yesterday pursuant to a complaint filed in this district that was unsealed yesterday (the "Complaint"). The Complaint, which bears the docket number 16-Mag-2978, is attached hereto as Exhibit A.

Jason Galanis was arrested yesterday in the Central District of California and presented before a United States Magistrate Judge in that district. Although the prosecutors in that district argued for detention, Jason Galanis was bailed without bond, but was ordered to submit to home detention and electronic monitoring. Jason Galanis was also ordered to surrender in this district on May 17, 2016 in order to make his initial appearance on the Complaint before a United States Magistrate Judge in this district. He is expected to appear in this district on that date. The Government respectfully requests, pursuant to 18 U.S.C. § 3148(b), that Your Honor schedule a bail revocation proceeding on May 17, 2016 regarding Jason Galanis's release on bail in connection with the Indictment. In light of the allegations in the Complaint, the Government avers that it can demonstrate during such proceeding that there is probable cause to believe that Jason Galanis committed a Federal, state, or local crime while on release in connection with the Indictment, *see* 18 U.S.C. § 3148(b)(1)(A), and either that there is no condition or combination of conditions that will assure that Jason Galanis will not flee or pose a danger to the safety of any other person or the community, *see* 18 U.S.C. § 3148(b)(2)(A), or that Jason Galanis is unlikely to abide by any condition or combination of conditions of release, *see* 18 U.S.C. § 3148(b)(2)(B).

John Galanis was arrested yesterday in the Southern District of California and presented before a United States Magistrate Judge in that district. He is presently detained pending a detention hearing scheduled for Friday, May 13, 2016 in that district. The Government will provide the Court with an update as to the outcome of that proceeding and whether, in light of the outcome of that proceeding, the Government seeks revocation of bail or modification of the bail conditions established for John Galanis in connection with the Indictment.

Gary Hirst was arrested yesterday in the Middle District of Florida and presented before a United States Magistrate Judge in that district. He was released pursuant to a $1 million personal recognizance bond secured by the $200,000 of collateral already pledged in connection with the bail conditions set for Hirst with respect to the Indictment. The Government is not seeking revocation of bail or modification of Hirst's bail conditions at this time.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s Brian R. Blais
Brian R. Blais
Rebecca Mermelstein
Aimee Hector
Assistant United States Attorneys
(212) 637-2521/2360/2203

cc: All counsel of record (via ECF)

Exhibit A

(Complaint – 16 Mag. 2978)

[Note: This exhibit is too voluminous to fax, but has been filed via ECF]